

Exhibit 41:

T.P. Declaration

DECLARATION OF T.P.

1. I am a former registrant of the Michigan Sex Offender Registry. I was convicted of CSC-4 around 1993, before Michigan had a registry. The court sentenced me to two years of probation, three months of GPS monitoring, and three months of community service. I was recommended for early release from probation. Because the SORA law went into effect about a month before my probation ended, however, I was forced to register. I was on the registry for 17 years before being removed in 2011.

2. After being added to the registry, it was very hard to find a job. When I was added to the registry in 1994, I lost my job with the Lansing Police Department that I had held for 22 years. Thanks to close contacts who had known me for a long time, I was able to find other employment working with equipment and making sales calls.

3. Eventually, I was recommended for and applied to a similar job that offered better benefits and twice as much pay. I completed the interview and was accepted for the position, even being told to pick out the company car that would be assigned to me. Despite the company being aware of my conviction before the interview, I was contacted by my interviewer who told me that the HR department could not let me become an employee because I had shown up on the public sex offender registry. I was told point blank that if I had just had a conviction and was not on the public sex offender registry, they would have had no issue with hiring me.

4. I was then hired by a different company where I recommended equipment to end users. I stayed at this job for four years, until the company cut back on the sales force, and I was let go.

5. Following this, I found another job at a warehouse. After six months, I was recommended for a management position, but then I was told that because I was on the Sex Offender Registry, they could not move me into a management position. Eventually, I was able to open my own business which I ran for over ten years.

6. While I was on the public registry, my family suffered. My daughter, who was in high school at the time, was harassed by other students about my registration status to the point that she started skipping all of her classes. My wife was told she was no longer welcomed by her friends who refused to call or see her. Our home and cars were repeatedly vandalized.

7. Being on the registry made me feel like the world would rather I be dead and that all I was good for was crime. I felt constantly shamed. Every day I worried that if someone found out I was on the registry, they would no longer want anything to do with me; this happened more than once. I lost jobs, friends, family and hope at different points while on the registry. At one point, my own daughter married, moved out and stopped talking to me, claiming she was happy she did not share my last name anymore. It took eight years for her to come back to us.

8. In my lifetime, I have only had one other thing happen to me that was worse than being on the Public Sex Offender Registry and that was the death of one of my daughters who died from cancer at ten years old. Absent that, I could say without question that being on the Public Sex Offender Registry was the worst experience of my 60 years of life.

9. Since being removed from the registry, my life has changed dramatically. I no longer experience harassment from people who have looked me up on the registry. I have also been offered numerous good jobs since being removed from the registry, even though my conviction is still on my record. I primarily focus my time performing volunteer work for important causes.

I certify under penalty of perjury that the following statement is true and correct pursuant to 28 U.S.C. § 1746.

T.P.
(name on file with Plaintiff's counsel)

Dated: March 14, 2023